Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	CC Docket No. 95-155
Toll Free Service Access Codes)	

American National Red Cross Request for Extension of Time

The American National Red Cross ("American Red Cross" or "Red Cross") hereby respectfully submits this request for an extension of time to file its Opposition to 800Ideas.com's Petition for Reconsideration¹ in the above-captioned docket. On September 2, 2005, the Federal Communications Commission ("Commission" or "agency") reassigned the number 1-800-733-2767 (1-800-RED CROSS) to the Red Cross to assist in the recovery efforts for Hurricane Katrina and other relief initiatives for one year. 800Ideas.com filed a Petition for Reconsideration of that decision. According to the Commission's Electronic Comment Filing Systems ("ECFS"), the Petition was filed on September 30, 2005.

Section 1.106(f) of the Commission's rules requires that petitions for reconsideration be "served upon parties to the proceeding." Given that the Red Cross requested that the Commission take the action it did and that the number 1-800-733-2767 was reassigned to the Red Cross, the Red Cross was entitled to be served. However, no service list was included with the Petition, and the Red Cross has no record of being served. It was only by happenstance that the Petition was brought to the Red Cross's attention. Upon hearing that a petition had been filed on October 4, 2005, the Red Cross obtained a copy from the Commission's website.

1

¹ 800Ideas.com, Inc. Petition for Reconsideration, CC Docket No. 95-155 (filed Oct. 30, 2005) ("Petition").

² Toll Free Service Access Codes, Order, CC Docket No. 95-155 (rel. Sept. 2, 2005) ("Order").

Section 1.106(g) of the Commission's rules requires that oppositions to petitions for reconsideration be filed within ten days after the petition is filed. Because the Red Cross was not served and therefore did not receive a copy of the Petition until October 4, the Red Cross requests that the Commission extend the date by which the Red Cross's opposition must be filed to October 14 – ten days after the Red Cross obtained a copy of the Petition. Section 1.3, 47 C.F.R., allows the Commission to waive its rules "if good cause therefor is shown." Failure to serve a petition for reconsideration is good cause for an extension of the time to file an opposition. Moreover, allowing the Red Cross to file an opposition serves the public interest by ensuring that the Commission has a complete record upon which to make a decision.

Therefore, the Red Cross respectfully urges the Commission to waive rule 1.106(g) and allow the Red Cross to file its opposition to the Petition by October 14, 2005.

Respectfully submitted,

Mary S. Elcano General Counsel and Corporate Secretary American Red Cross 2025 E Street, N.W. Washington, D.C. 20006 (202) 303-5422

Fax: (202) 303-0143

/s/ R. Michael Senkowski
R. Michael Senkowski
Gregory J. Vogt
Suzanne Yelen
WILEY REIN & FIELDING LLP
1776 K Street, N.W.
Washington, D.C. 20006
(202) 719-7000
Fax: (202) 719-7049

October 11, 2005

Service List

I, Robin Walker, hereby certify that on October 4, 2005, I caused a true copy of this American National Red Cross Request for Extension of Time to be filed on the following via U.S. first-class mail:

Mr. David Sprouse 800Ideas.com, Inc. 9577 Chesapeake Drive, 2nd Floor San Diego, CA 92123

> <u>/s/ Robin Walker</u> Robin Walker